

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

COREY HARDIN, DAVID MUHAMMAD, and
CHASE WILLIAMS, individually and on behalf
of all others similarly situated,

Plaintiffs,

v.

TRON FOUNDATION, JUSTIN SUN, and
ZHIQIANG (LUCIEN) CHEN,

Defendants.

Case No. 1:20-cv-02804-VSB

**JOINT STIPULATION AND ORDER
REGARDING PAGE LIMITS FOR
MOTION TO DISMISS BRIEFING**

Plaintiffs Corey Hardin, David Muhammad, and Chase Williams (collectively, “Lead Plaintiffs”), individually and on behalf of all others similarly situated, and Defendants TRON Foundation (“TRON”) and Justin Sun (together, the “Stipulating Defendants,” and collectively with Lead Plaintiffs, the “Stipulating Parties”), by and through their undersigned counsel, hereby stipulate as follows:

WHEREAS, on August 24, 2020, Lead Plaintiffs filed an amended class action complaint (the “Amended Complaint”) against the Stipulating Defendants and defendant Zhiqiang (Lucien) Chen, which spans 209 pages and contains 103 causes of action under federal and state law (Dkt. No. 29);

WHEREAS, on September 17, 2020, Lead Plaintiffs filed a Certificate of Service for their Amended Complaint (Dkt. No. 35);

WHEREAS, on October 30, 2020, the Court entered an order directing all Defendants to answer or otherwise respond to the Amended Complaint by no later than December 15, 2020 (Dkt. No. 49);

WHEREAS, the Stipulating Defendants intend to file a motion to dismiss the Amended Complaint by no later than December 15, 2020;

WHEREAS, absent an order extending page limits, the Court's Individual Rules limit opening and opposition briefs to 25 pages and limit reply briefs to 10 pages;

WHEREAS, the Stipulating Parties have met and conferred and hereby agree that good cause exists to extend the length of the Stipulating Defendants' opening brief and Lead Plaintiffs' opposition brief to 40 pages each, and to extend the length of the Stipulating Defendants' reply brief to 16 pages, in light of the complex technical and legal issues presented as well as the number of causes of action contained within the Amended Complaint; and

WHEREAS, this proposed extension of pages is consistent with the default proportions for motion briefing set forth in this Court's Individual Rules.

IT IS ACCORDINGLY STIPULATED, by and between the undersigned counsel for Lead Plaintiffs and the Stipulating Defendants, subject to the Court's approval, as follows:

1. The Stipulating Defendants' open brief in support of their motion to dismiss shall not exceed 40 pages;
2. Lead Plaintiffs' brief in opposition to the Stipulating Defendants' motion to dismiss shall not exceed 40 pages; and
3. The Stipulating Defendants' reply brief in support of their motion to dismiss shall not exceed 16 pages.

IT IS SO STIPULATED.

Dated: November 20, 2020

/s/ Jordan A. Goldstein (by consent)

Philippe Z. Selendy
Jordan A. Goldstein
Michelle Foxman
Mitchell Nobel
SELENDY & GAY, PLLC
1290 Sixth Avenue, 17th Floor
New York, NY 10104
pselendy@selendygay.com
jgoldstein@selendygay.com
mfoxman@selendygay.com
mnobel@selendygay.com

Kyle W. Roche
Edward Normand
Velvel (Devin) Freedman
Jordana L. Haviv
ROCHE CYRULNIK FREEDMAN LLP
99 Park Avenue, 19th Floor
New York, NY 10016
kyle@rcfllp.com
tnormand@rcfllp.com
vel@rcfllp.com
jhaviv@rcfllp.com

Attorneys for Lead Plaintiffs and the Class

Respectfully submitted,


/s/ Dean S. Kristy

Dean S. Kristy (NY Bar #1945658)
Casey O'Neill (NY Bar #4715363)
Michael S. Dicke (admitted *pro hac vice*)
Alison C. Jordan (admitted *pro hac vice*)
FENWICK & WEST LLP
555 California Street, 12th Floor
San Francisco, CA 94104
Telephone: 415.875.2300
Facsimile: 415.281.1350
Email: dkristy@fenwick.com
Email: coneill@fenwick.com
Email: mdicke@fenwick.com
Email: ajordan@fenwick.com

*Attorneys for Defendants TRON Foundation
and Justin Sun*

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: November 23, 2020


Vernon S. Broderick
United States District Judge